

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: CITY OF CHESTER, PENNSYLVANIA, Debtor.	: : : : : : :	Chapter 9 Case No. 22-13032 Judge Ashely M. Chan
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NOTICE OF MOTIONS, RESPONSE DEADLINES, AND HEARING DATE

On November 10, 2022 (the “Petition Date”), the City of Chester (“Chester” or the “City”), filed *inter alia*, a (1) Motion for Entry of an Order (I) Appointing a Judicial Mediator, (II) Referring Certain Matters to Mandatory Mediation, and (III) Granting Related Relief [Docket No. 16] (the “Mediation Motion”) and (2) Motion of Debtor to Reject the Parking Agreement Between the City and PFS VII LLC Effective as of the Petition Date [Docket No. 18] (the “Rejection Motion,” and together with the Mediation Motion, the “Motions”). The Mediation Motion seeks entry of an order (i) appointing a judicial mediator to mediate any and all issues related to a comprehensive resolution of the City’s obligations and certain pending litigation through a plan of adjustment, (ii) referring such matters to mandatory mediation, and (iii) granting related relief. The Rejection Motion seeks to reject the Parking Agreement¹ with PFS VII LLC effective as of the Petition Date.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motions.

2. **If you do not want the court to grant the relief sought in the Motions** or if you want the Court to consider your views on the Motions, then on or before **November 30, 2022 you or your attorney must file a response to the Motions.** (*See Instructions on next page*).

3. A hearing on the Motions is scheduled to be held before the Honorable Ashely M. Chan on **December 15, 2022 at 10:00 a.m. (prevailing Eastern Time) in the United States Bankruptcy Court, 900 Market Street, 2nd Floor, Courtroom No. 4, Philadelphia, Pennsylvania, 19107.** The hearing will be conducted in person and via Zoom. Parties who wish to appear via Zoom should contact the Judge's Courtroom Deputy, Joan Ranieri, for access information. Unless the court orders otherwise, the hearing on these Motions will be an **evidentiary hearing.**

4. **If you do not file a response to the Motions,** the court may cancel the hearing and enter an order granting the relief requested in the Motions.

5. You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the Motions are not enclosed, copies of the Motions will be provided to you if you request a copy from the City's attorneys whose name and address is listed on the next page of this Notice.

Filing Instructions:

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at:

United States Bankruptcy Court
Eastern District of Pennsylvania
Clerk's Office
900 Market Street, Suite 400
Philadelphia, PA 19106

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 of this Notice.

10. **On the same day that you file or mail your response to the Motion, you must mail or deliver a copy of the Response to the City's attorneys:**

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And, the Office of the United States Trustee:

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November 16, 2022

Respectfully submitted,

/s/ Tobey M. Daluz

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(*Admitted *pro hac vice*)

Attorneys for the City of Chester